To Whom it May Concern:

The RCDs would like to respectfully submit some suggested edits to Volume 3, Chapter 2 Ag Water Use Efficiency.

Primarily, our comments regard technical assistance. With 2 main concerns and one suggestion:

- 1) In the text, the importance of technical assistance is not identified in a few places where it is crucial
- 2) The recommendations don't address the complexity of technical assistance delivery. The text identifies UCCE and the academic institutions as the preferred provider of technical assistance. This is not accurate. Both RCDs and UCCE are entities of the State. RCDs have been providing this type of assistance for nearly 100 years. RCDs work interchangeably and in partnership with the UCCE. In some places RCDs offer more technical assistance than UCCE. For example, in Santa Barbara, UCCE is non-existent. The Cachuma RCD has an extensive mobile irrigation program that provides county wide support to growers. In many counties UCCE and the RCDs work side by side to interchangeably provide these services like in Napa and Sonoma County where they both provide the services, but (for funding reasons) the RCD actually provides more assistance than UCCE.

In addition, this doesn't recognize the thousands of independent crop advisors that work.

I would suggest 2 strategies for dealing with this:

- a) Remove UCCE as the preferred and identified provider of these services. This was done well in recommendation 13 under education and outreach.
- b) Include RCDs and crop advisors in the list of technical service providers.
- 3) Recommendation 12 is problematic. After providing technical assistance to growers for almost 100 years, the RCDs have learned that if you tie technical assistance to data collection for State purposes, it is difficult to get growers to participate in technical assistance. It should be noted that the data would be collected anonymously.

My specific text edit recommendations are listed below.

Thanks,
Karen Buhr
Executive Director
California Association of Resource Conservation Districts

Specific text edits:

Pg 2-11 lines 36 and 37-

Further investments in research, and demonstration and technical assistance for growers is are critical, especially in 35 support of university-based research, field station studies, and Cooperative Extension demonstration 36 projects and technical assistance outreach through the Resource Conservation Districts.

Pg 2-21 Education and Training should address technical assistance as well. Technical assistance goes above and beyond training and education

Education and Training 29

Improving agricultural water use efficiency depends on disseminating information on the use, costs, 30 benefits, and impacts of technologies; providing technical assistance on the site specific nature of implementing technology and on providing incentives for implementation. Experience shows 31 that water suppliers and growers respond strongly to financial incentives. In addition, while the Water 32 Code provides certain water rights protections and incentives to conserve water, reaffirming and 33 reinforcing such mechanisms could significantly improve results statewide. Education and training 34 programs can emphasize the both the potential benefits and the risks of efficiency improvements, 35 including the risks to soil sustainability from a salinity standpoint, or that energy use may increase. Technical assistance can assist growers in implementing technologies for maximum efficiency and in site specific ways.

Pg 2-22 lines 14-17

DWR, in cooperation with academic institutions, resource conservation districts, and independent crop advisors should provide technical assistance to water 14 suppliers and farmers to evaluate their agricultural water use efficiency by computing the effi-15 ciency quantification methods outlined in the DWR 2012 report to the Legislature, A Proposed 16 Methodology for Quantifying the Efficiency of Agricultural Water Use. 17

Pg 2-22 27-29- If you are going to specificially mention UCCE (ag extension), you should specifically mention the other providers. Either eliminate the reference to UCCE or include RCDs and independent crop advisors. See education and training recommendation #13 for a good example of how not to call any one institution out.

The State should expand water efficiency information, evaluation programs, and on-site tech-27 nical assistance provided through agricultural extension services, Resource Conservation Districts, Independent Crop Advisors and other agricultural outreach 28 efforts.

Pg 2-23 recommendation number 17 should include technical assistance providers